

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

JOAN M TURNER, GUARDIANSHIP
Of MARANDA PERRY, Incapacitated
Kindred Healthcare
8 Colonial Dr
Westborough MA 01581

Plaintiff

Vs.

JORDAN HOSPITAL
Aka
BETH ISRAEL DEACONESS HOSPITAL
275 Sandwich St
Plymouth MA 02360

METRO WEST MEDICAL CENTER
FRAMINGHAM UNION HOSPITAL
115 Lincoln St
Framingham, MA 01702

FILED
IN CLERKS OFFICE
2016 MAR -8 P 3:52
CIVIL ACTION
NO.
U.S. DISTRICT COURT
DISTRICT OF MASS.

COMPLAINT

Plaintiff, Joan M Turner, Guardianship of her daughter, Maranda Perry, incapacitated, residing at by the way of this Complaint against Defendants, states:

Parties

1. Plaintiff, Joan M Turner (hereinafter "plaintiff"), is an adult individual residing at 1630 Worcester Road apt 107c, Framingham, MA 01702 is a citizen of the United States.
2. Defendant, Jordan Hospital now known as Beth Israel Deaconess Health Care at 275 Sandwich St, Plymouth MA 02360 United States.

3. Defendant, Metro West Medical Center, Framingham Union Hospital at 115 Lincoln St, Framingham, MA 01702 United States.

Jurisdiction

4. This court has jurisdiction over this matter pursuant to 28 U.S.C. ss 1332.

FACTS

5. Plaintiff, Maranda Perry, 27 years old at the time, a single parent with a 9 year old son. Originally, a Detox patient at High Point Treatment Center in Plymouth, MA.
6. Plaintiff, Maranda Perry, first visit to Jordan Hospital, Defendant, on 02/27/2013, for Hyperosmolar Hyperglycemic State (DC).
7. Defendant, Jordan Hospital, released the Plaintiff, Maranda Perry, with follow up instructions and ok'd her for return back to High Point Treatment Center.
8. On 3/01/2013, Maranda Perry, Plaintiff, then admitted to Jordan Hospital, Defendant, for 10 days prior, to being transported to Metro West Medical Center.
9. Plaintiff, Maranda Perry, was being treated for high blood sugars, high blood pressure and renal issues.
10. Defendant, Jordan Hospital had also completed the detoxing treatment of, Plaintiff, Maranda Perry.
11. Defendant, Jordan Hospital, kept the Plaintiff, Maranda Perry, heavily sedated most of the time when she was an inpatient there. Plaintiff hardly knew when she had visitation and appeared visibly swollen.
12. Defendant, Jordan Hospital was over medicating the Plaintiff, Maranda Perry, with high dosage of medicine that led to some sort of reaction. Since patient already had preexisting medical history issues such as diabetes and kidney problems, Plaintiff should have been monitored closely due to the meds they were prescribing her.

13. Defendant, Jordan Hospital, administered: Amlodipine 50 mg a day, Ativan, Haldol, Labetalol 300 mg 3x a day (then increased it to 600 mg 3x a day), Metoprolol 50 mg 2x a day, Nifedipine 90 mg a day and Respridol. Plaintiff, Maranda Perry, small frame could not tolerate all those meds and it's a known fact that these meds can cause some serious side effects. Such as swelling, heart palpitation, etc.
14. On 3/09/2013, Plaintiff, Maranda Perry, had visits from her son and immediate family. This was the only day that she actually had the opportunity to interact with everyone considering the Defendant, Jordan Hospital, kept her sedated. During that visit the Plaintiff hands, face and body was swollen. I was concerned about my daughter's appearance and mentioned to the Plaintiff to inform the nurses.
15. On 3/10/2013, Plaintiff, Maranda Perry was transported to Defendant, Metro West Medical Center by ambulance.
16. Plaintiff, Maranda Perry, was complaining about having trouble breathing prior to leaving Defendant, Jordan Hospital.
17. Plaintiff, Maranda Perry, should have been kept for further observation by Defendant, Jordan Hospital before the transport.
18. Defendant, Jordan Hospital, had the Plaintiff, Maranda Perry, transported anyways without further evaluation.
19. If the Defendant, Jordan Hospital, did not consider the Plaintiff, a reliable historian, why should they take it upon themselves to discredit the plaintiff as if she did not know what she was talking about?
20. Plaintiff, Maranda Perry, called her only son telling him she would see him soon. Once the Defendant, Jordan Hospital had her transported to Defendant, Metro West Medical Center that would be the last time the Plaintiff's son would ever communicate with his mother.
21. Upon arrival that evening at Defendant, Metro West Medical Center, The Plaintiff, Maranda Perry, needed medical attention.
22. Plaintiff, Maranda Perry, went into cardiac arrest at Defendant, Metro West Medical Center.

23. Defendant, Metro West Medical Center states to the Plaintiff's mother that the Plaintiff, Maranda Perry, had been placed in a room and had collapsed.
24. Defendant, Metro West Medical Center, Also states that a doctor was in the room with the Plaintiff, Maranda Perry, when she coded and they revived her quickly.
25. Defendant, Metro West Medical Center, has time frame discrepancies because if the Plaintiff, Maranda Perry, was placed in a room at 10:50 pm. per the notes and another note says at 11:00 pm they found her lifeless on the floor, begun CPR. How can the Defendant tell the plaintiff's mother that someone was in the room with her the whole time, if she is now incapacitated?
26. Defendants, Jordan Hospital and Metro West Medical Center has not truthfully, stated what happen to the Plaintiff, Maranda Perry.
27. Plaintiff, Maranda Perry, Patient rights weren't upheld by both of the Defendants and now because of the Plaintiff is incapacitated and most likely will never walk, talk ever again.
28. WHEREFORE, the plaintiff demands judgment against the defendants for damages and such other relief as this Court deems just.
29. If the Plaintiff wants a trial by jury, it must be requested by the Plaintiff.
30. The Plaintiff demands a trial by jury.

Signature Joan M Turner
Name JOAN M TURNER
Address 1630 Worcester Rd apt 107c
Framingham Ma 01702

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